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January 14, 2022

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

MEMO ENDORSED

Re: SEC v. Bronson, et. Al, 12-cv-6421 (KMK)

Dear Judge Karas:

Mr. Bronson respectfully requests that this Court stay the execution of the Order dated November 24, 2021 (Docket No. 301, the "Order") pending processing of the payment dated January 21, 2022.

Pursuant to the Order, Mr. Bronson was to pay \$500,000.00 on or before December 23, 2021, \$1,100,000 on or before January 13, 2022 and make \$1,100,000 payments each month thereafter until the judgement against him has been paid in full. Since the Order, Mr. Bronson paid \$800,000 towards the disgorgement and he reasonably anticipates completing the current obligation with another \$800,000 upon processing the January 21st payment. He expected to receive funds sufficient to make the remaining \$800,000 payment prior to the date set by the Court. While those funds were delayed, Mr. Bronson reasonably anticipates receipt of those funds in time to process the January 21st payment. After this payment, Mr. Bronson will be current with the payment schedule. Because the proposed incarceration is compulsory, and because he is working in good faith to make this payment, incarceration is not necessary.

Thank you for your consideration.

Sincerely,

/s/ Ryan O'Quinn

Ryan O'Quinn

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Mr. Bronson's obligations under the Court's Order were clear: He was required to pay \$500,000 on or before December 23, 2021, which he did, and \$1,100,000 on or before January 13, 2022, which he did not. Moreover, Mr. Bronson forfeited the "good faith" defense long ago, based on his failure to honor his promise to make prior payments, and based his suspect testimony at the last hearing. So, he either makes the remainder of the payment he currently owes by noon on January 19, 2022, or he will go to prison. Moreover, he is NOT to miss a single payment by a single day going forward, or he will go to prison.

So Ordered.

A handwritten signature in blue ink, appearing to be 'KMK', written over the words 'So Ordered.'

1/14/22